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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ALLY ALLY MOHAMED,  
a/k/a "Ally Maumba,"

Defendant.

SEALED INDICTMENT

15 Cr.

**15 CRIM 842**

COUNT ONE

(Heroin Importation Attempt)

The Grand Jury charges:

1. From at least in or about August 2012 up to and including in or about June 2013, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, ALLY ALLY MOHAMED, a/k/a "Ally Maumba," the defendant, who will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, intentionally and knowingly did attempt to distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, in violation of Sections 959(a) and 963 of Title 21, United States Code.

2. The controlled substance involved in the offense was one kilogram and more of a mixture and substance containing a detectable amount of heroin, in violation of Sections 812, 960(a)(3) & (b)(1)(A) of Title 21, United States Code.  
(Title 21, United States Code, Sections 959(c), 963; Title 18, United States Code, Section 3238.)

JUDGE TORRES

**COUNT TWO**

(Methamphetamine Importation Conspiracy)

The Grand Jury further charges:

3. From at least in or about November 2014 up to and including on or about October 3, 2015, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, ALLY ALLY MOHAMED, a/k/a “Ally Maumba,” the defendant, who will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, with others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and object of the conspiracy that ALLY ALLY MOHAMED, a/k/a “Ally Maumba,” the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, intending and knowing that such substance would be imported into the United States from a place outside thereof, in violation of Sections 812, 959(a), 960(a)(3), 960(b)(1)(H), and 963 of Title 21, United States Code.

(Title 21, United States Code, Sections 959(c), 963; Title 18, United States Code, Section 3238.)

**COUNT THREE**

(Methamphetamine Importation)

The Grand Jury further charges:

5. On or about October 3, 2015, in the Southern District of New York and elsewhere, ALLY ALLY MOHAMED, a/k/a “Ally Maumba,” the defendant, who will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be in the Southern District of New York, intentionally and knowingly did distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 959(a).

6. The controlled substance that ALLY ALLY MOHAMED, a/k/a “Ally Maumba,” the defendant, distributed, intending and knowing that such substance would be imported into the United States from a place outside thereof, was 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 960(b)(1)(H).

(Title 21, United States Code, Sections 959, 960; Title 18, United States Code, Section 2.)

**FORFEITURE ALLEGATIONS**

7. As a result of committing the controlled substance offenses alleged in Counts One, Two, and Three of the Indictment, ALLY ALLY MOHAMED, a/k/a “Ally Maumba,” the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said offense and any and all property

used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Counts One, Two, and Three of this Indictment.

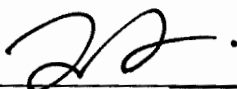
Substitute Assets Provision

8. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 and 970.)

  
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FOREPERSON

  
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PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SEALED INDICTMENT

15 Cr.

(21 U.S.C. §§ 959, 963; 18 U.S.C. § 2.)

\_\_\_\_\_  
PREET BHARARA  
United States Attorney.

A TRUE BILL



\_\_\_\_\_  
Foreperson.

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12/3/15

Filed Sealed Indictment

Filed Arrest warrants

on

Judge Wetburn